

Commonwealth of Kentucky
Division for Air Quality
RESPONSE TO COMMENTS

ON THE TITLE V DRAFT PERMIT V-06-023

Covalence Specialty Adhesives

2320 Bowling Green Road

Franklin, KY 42134

Date January 8, 2007

Sajjad Quabili, Reviewer

SOURCE ID: 021-213-00011

AGENCY INTEREST #: 3975

ACTIVITY ID: APE20040003

SOURCE DESCRIPTION:

An operating permit application was received from Covalence Specialty Adhesives on December 15, 1999 and was complete on January, 29, 2004. The applicant proposes to operate adhesive spreadlines, flexographic printers, four boilers and six ethylene oxide sterilizers.

PUBLIC AND U.S. EPA REVIEW:

On November 30, 2006 the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Franklin Favorite* in Franklin, Kentucky. The public comment period expired 30 days from the date of publication.

Comment received

Comments were received from Covalence Specialty Adhesives on December 21, 2006. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Minor changes were made to Statement of Basis and Permit Summary Form. Please see Attachment A for a detailed explanation of the changes made to the permit. The U.S. EPA has 45 days to comment on this proposed permit.

ATTACHMENT A

Response to Comments

Comments on Covalence Specialty Adhesives Draft Title V Air Quality Permit submitted by Michael Szabo, Consultant, GZA GeoEnvironmental, Inc.

1. Emission Points 01, 02 and 03 (01, 02, 03) Cleaver Brooks Boilers (3)

2. Emission Limitations:

Compliance Demonstration Method for a and b:

Change the second paragraph to establish “normal” emissions for the weekly visual observation as opposed to seeing “any” emissions as follows:

- (2) “The permittee shall perform a qualitative visual observation of the opacity of emissions from the stack for any visible emissions above normal on a weekly basis when burning #2 fuel oil and maintain a log of the observations. The permittee shall establish “normal” for the stack in the first 30 days following permit issuance. If visible emissions from are observed to be above normal, the permittee shall determine the opacity of emissions by U.S. EPA Reference Method 9 and initiate an inspection of the unit for any necessary repairs.”

Division’s response: The Division does not agree with GZA to establish a “normal” stack emission for the above mentioned boilers. “Normal” emission is not clearly defined in the qualitative analysis. The “normal” emission is too subjective; it may be construed differently for the same emission. No changes were made in the permit.

2. Emission Point 04 (04) Cleaver Brooks Boiler

2. Emission Limitations:

Compliance Demonstration Method for a and b:

Change the second paragraph to establish “normal” emissions for the weekly visual observation as opposed to seeing “any” emissions as follows:

- (2) “The permittee shall perform a qualitative visual observation of the opacity of emissions from the stack for any visible emissions above normal on a weekly basis when burning #2 fuel oil and maintain a log of the observations. The permittee shall establish “normal” for the stack in the first 30 days following permit issuance. If visible emissions from are observed to be above normal, the permittee shall determine the opacity of emissions by U.S. EPA Reference Method 9 and initiate an inspection of the unit for any necessary repairs.”

Division’s response: Same issue as explained above in #1. No changes were made in the permit.

3. Emission Point 82 (82) Spreadline #5

2. Emission Limitations:

Continuing compliance

Add the following statement for consistency with Emission Point 12, Spreadline 3: “After demonstrating initial compliance using the compliance demonstration equation, the permittee will not be required to quantify coating usage on a 24-hour basis for the purposes of continuous compliance with 401 KAR 59:210 unless requested by the Division.”

Division's response: Comment acknowledged, change made.

4. **EP 30 (30) Nauta Primer Mixer/Condenser**

Change the **description** to read as follows: "This is an adhesive mixer unit with an integral condenser."

1. **Emission Limitations:**

Change the following condition to reflect the applicability determination we submitted instead of the precompliance plan that was previously referred to in this condition:

"§63.8005(d)(3). Compliance requirements (EP 30). The permittee has elected to conduct an applicability determination using engineering and test data under worst case operating conditions pursuant to §63.8105, to demonstrate that the Nauta mixer exhaust vent uncontrolled emissions after the process condenser contain <50 ppmv HAP and thus, is not considered to be a process vent. The permittee shall submit the results of the applicability determination to the Division for review and approval."

Division's response: Comment acknowledged, change made.

5. **Specific Reporting Requirements:**

Change the following condition to delete the previous reference to a pre-compliance plan, since a pre-compliance plan is not needed for the Nauta Mixer/Condenser:

"§63.8075. Reporting requirements. The permittee shall submit each report in Table 9 to subpart HHHHH that applies to the source, including a notification of compliance status report containing the information specified in §63.8075(d) and semi-annual compliance reports containing the information specified in §63.8075(e)."

Division's response: Comment acknowledged, change made.

6. **Emission Point 66 (66) Six Ethylene Oxide Sterilizers Controlled with a Catalytic Oxidizer**

3. Testing Requirements: §63.365

Revise conditions a. and b. to reflect the fact that Covalence has already demonstrated initial compliance through performance testing and has chosen to replace the catalytic oxidizer catalyst every 5 years as the continuing compliance option and thus, doesn't need to do the continuous performance testing previously covered under Condition b. The detailed description of test methods included in (§63.365 (b)(1) (i) through (v) was removed and cited rather than keeping all of this verbiage in the text of the permit, since Covalence will not need to do this testing unless it changes continuing compliance options. The revised conditions are as follows:

"a. Initial performance testing. An initial test to determine ethylene oxide emissions from the sterilization chamber vents was performed in May, 2000, as required by §63.363(a)(1). The permittee complied with the performance testing requirements in §63.7 of subpart A of this part 63, according to the applicability in Table 1 of §63.360, and in §63.365. The permittee conducted the performance test using the procedures described in §63.365(b). To determine compliance with Emission Limit B.2.a., the permittee repeated the procedures contained in §63.365 (b)(1) (i) through (v), three times. The permittee demonstrated compliance with Emission Limit B.2.a."

“b. Continuous performance testing. Since the permittee has chosen to comply with §63.363(b)(4)(iii), no continuous performance testing is required. If the permittee decides to comply with §63.363(b)(4)(i), the permittee shall conduct a performance test once per year during routine operations, i.e., with product in the chamber using the procedures described in §63.365(b). To determine compliance with Emission Limit B.2.a., the permittee shall repeat the procedures contained in §63.365(b)(1) (i) through (v), three times.”

Division’s response: Comment acknowledged, change made.

7. **SECTION C. INSIGNIFICANT ACTIVITIES**

The numbering of the insignificant emission activities list was modified to delete the emission units subject to 40 CFR 63, Subpart HHHHHH, i.e. EP 30 Nauta Primer Mixer/Condenser, EP 31 Primer Fill and Transfer Operations and EP 32 Primer Storage Tanks, since they cannot be listed as insignificant emission units. The insignificant emission activities list was renumbered accordingly.

Division’s response: Comment acknowledged, change made.

STATEMENT OF BASIS:

GZA made some comments on Statement of Basis about typographical mistakes, provided additional information on the issuance of the construction permits and requested some changes to reflect the comments made on the draft permit. The permit writer acknowledged these comments and revised the Statements of Basis accordingly.

PERMIT APPLICATION SUMMARY FORM:

GZA made some comments on Permit Summary Application Form about typographical mistakes, provided additional information on the issuance of the construction permits and requested some changes to reflect the comments on the draft permit. The permit writer acknowledged these comments and revised the Permit Application Summary Form accordingly.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR 61, Sec. 61.12 into its air quality regulations.